REMARKS

Claims 1-56 were presented for examination and were pending in this application. In a non-final Official Action dated March 16, 2009, claims 1-56 were rejected. Applicant thanks the Examiner for examination of the claims pending in this application and addresses the Examiner's comments below. Based on the following Remarks, Applicant respectfully requests that the Examiner reconsider all outstanding objections and rejections, and withdraw them.

35 USC §112 Rejection

The Examiner rejects claims 1, 17, 33, 41 because these claims recite "Traffic Manager" in the first 3 lines of the claims, and according to the Examiner, there is insufficient antecedent basis for this limitation. However, the first word of these claims "A" introduces the traffic manager and provides antecedent basis for the traffic manager. The Examiner therefore incorrectly rejects these claims or fails to properly articulate the rejection. The applicant requests that this rejection be withdrawn or more clearly articulated.

35 USC §103(a) Rejection

Claims 1-56 are rejected under 35 US.C. § 103(a) as being unpatentable over U.S. patent 6,134,589 and further in view of Tuatini (US. 2002/0010781). As an initial matter, the Examiner refers to US patent 6,134,589 as Abjanic but the first named inventor for this patent is Hultgren and Abjanic is not listed as one of the inventors for this patent. The Applicant will therefore refer to U.S. patent 6,134,589 as Hultgren.

The amended Claim 1 recites:

A traffic manager for facilitating communication in accordance with at least one policy between a client node and a server node wherein the client node and the server node have at least

one distinguishing characteristic between them and the at least one distinguishing characteristic includes more than having distinguishing network addresses, the server node having a first interface associated therewith, the client node having an existing interface associated therewith, the traffic manager capable of communicating with both the client node and the server node and comprising a central processing unit which is operable to:

communicate with the server node via the first interface, wherein the first interface is incompatible with the existing client interface because of the at least one distinguishing characteristic;

generate at least a second interface, for communication with the first interface, in accordance with a protocol for exchanging information in a protocol message format and the at least one policy, wherein the at least one policy provides a mechanism to bridge the at least one distinguishing characteristic, wherein the traffic manager bridges the at least one distinguishing characteristic and facilitates communication between the client node and the server node; and

publish the second interface, thereby allowing the client node to access at least one service on the server node via the traffic manager in accordance with the at least one policy.

As explained in the pending application, a traffic manager facilitates communication in accordance with at least one policy between a server node and a client node. The server node interface and the client node interface are unable to communicate with each other because of one or more distinguishing characteristics, in addition to distinguishing network addresses, between the server node and the client node. The traffic manager therefore generates an interface according to one or more policies such that the new interface bridges the communication between the client node and the server node. The traffic manager then publishes the generated interface. The client node can now use this newly generated interface directly or through traffic manager to communicate with the server node.

The claimed invention therefore beneficially abstracts and centralizes the generation of interfaces at the traffic manager. This avoids the redundancy and inefficiency inherent in enabling each node to build its own interface.

Neither Hultgren nor Tuatini disclose, teach or suggest the claimed elements of "generate at least a second interface, for communication with the first interface, in accordance with the at

least one policy, wherein the at least one policy provides a mechanism to bridge the at least one distinguishing characteristic" or "publish the second interface, thereby allowing the client node to access at least one service on the server node via the traffic manager in accordance with the at least one policy."

The Examiner agrees that Hultgren does not disclose the above mentioned limitations and cites Tuatini for these limitations. However, Tuatini does not remedy the deficiencies of Hultgren.

Tuatini discloses an application architecture for communicating with a service in which each application includes translation logic, business logic and view logic. The translation logic receives a client's request for a remote service in client specific format, converts the request into an application specific format, and transmits the request to business logic. Tuatini, [0064]. The business logic receives the request in application specific format, services the request, and provides a response for the request to view logic in application specific format. Tuatini, [0064]. The view logic then converts the received response to client specific format and then sends the response to the client.

The Examiner argues that the translation logic is equivalent of second interface and therefore Tuatini discloses generating the second interface and publishing the second interface. However, Tuatini does no such thing. The translation logic in Tuatini is an inherent part of the application and is not generated or published. Moreover, Tuatini does not publish the translation logic or any other logic. Because applications in Tuatini do not generate or publish translation logic, Tuatini does not disclose "generate at least a second interface, for communication with the first interface, in accordance with the at least one policy, wherein the at least one policy provides a mechanism to bridge the at least one distinguishing characteristic" or "publish the second

interface, thereby allowing the client node to access at least one service on the server node via the traffic manager in accordance with the at least one policy."

Accordingly, neither Hultgren nor Tuatini, teach or suggest the above mentioned limitations of claim 1. Therefore, claim 1 is patentable over Hultgren and Tuatini, alone and in combination. Therefore, claim 1 is patentable over Hultgren and Tuatini.

Independent claims 17, 33, 41, 42 and 54 recite similar language and are also patentable over Hultgren and Tuatini, alone and in combination, for at least the same reasons.

The claims not specifically mentioned above depend from their respective base claims, which were shown to be patentable over Hultgren and Tuatini, alone and in combination. In addition, these claims recite other features not included in their respective base claims. Thus, these claims are patentable over Hultgren and Tuatini, alone and in combination, for at least the reasons discussed above, as well as for the elements that they individually recite.

Respectfully submitted,
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